Before the Federal Communications Commission Washington, DC 20554

In the Matter of:)	
)	
Implementing Public Safety Broadband Provisions of the Middle Class Tax Relief and Job Creation Act of 2012)	PS Docket No. 12-94
)	
)	
Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band)	PS Docket No. 06-229
)	
)	
Service Rules for the 698-746, 747-762 and 777- 792 MHz Bands)	WT Docket No. 06-150
)	

The State of Illinois Statewide Interoperability Coordinator (SWIC) respectfully submits these comments in support of the detailed response to the Commission's Notice of Proposed Rulemaking in the above-captioned proceeding¹ from the State of Illinois, Illinois State Police. These Comments focus on the issue of the relocation of 700 MHz Narrowband Systems licensees that remain in what has been redesignated as broadband public safety spectrum. Illinois, one of the licensees to which this relocation would apply, urges the Commission, in consultation with FirstNet, to provide a definitive source of funding and a rationale process to implement the relocation. The State of Illinois deployed its 700 Narrowband system under valid authority from the Commission and should not be required to bear the cost of the relocation. In addition to sufficient funding, the State of Illinois and other public safety

¹ Notice of Proposed Rulemaking, PS Docket No. 12-94, PS Docket No. 06-229 and WT Docket No. 06-150, released March 8, 2013

licensees facing relocation will need a process that recognizes the real work needed to complete the relocation process. Finally, that process must not compromise our public safety operations during or after relocation implementation.

The State of Illinois Statewide Interoperability Coordinator appreciates the opportunity to provide its comments of support for the official detailed response prepared by the Illinois State Police, on behalf of the State of Illinois, to this Notice of Proposed Rulemaking. The State of Illinois Statewide Interoperability Coordinator alongside all our Public Safety agencies believe that a step towards national compliance and a complete organized band plan can be achieved if the Commission, FirstNet, and NTIA jointly agree and decide that relocation costs are an eligible expense under the deployment funding provided to FirstNet by Congress.

Respectfully Submitted,

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Joe Galvin

State of Illinois Statewide Interoperability Coordinator

Illinois Emergency Management Agency